

## ERRATA

### **Marine Mammal Center Site and Facilities Improvements Environmental Assessment**

*The following additions/changes are shown below in italics and are thus made to the Marine Mammal Center Site and Facilities Improvements Environmental Assessment (EA) dated April 2004, by inclusion in these Errata sheets. None of these revisions would affect the outcome of the environmental analysis provided in the EA or materially change the selected alternative.*

#### **Page II-4**

*Of the 16 parking spaces available for use by the Center in shared locations outside the Center's assigned area, 3 would be at Fort Cronkhite near Building #1065. This change will be made each time this language appears in the EA.*

*The EA will be clarified to explain that bus parking will be located in the NPS maintenance yard near the Center.*

The following language appears in the EA:

Under all action alternatives, project construction would occur within two six-month periods to avoid the season (approximately March – September) of maximum animal occupation.

This language is replaced by the following language: *Under all action alternatives, pens and pools would not be constructed during the season (approximately March to September) of maximum animal occupation.*

#### **Page 11-8**

Figure II-2 has been revised to better show the parking for the Selected Alternative (attached).

#### **Page II-21**

Under Alternative 4 the parking at Fort Cronkhite should be 20 not 0.

#### **Page III-14**

Bedrock underlying the slopes and valleys around the project site also includes Franciscan chert (ancient sea floor) and greenstone (altered volcanic rocks), and young colluvium. The site is well above the floodplain, however surficial erosion gullies occur in the shallow soils on portions of this cut slope.

#### **Page A-1**

**Event Coordination.** Up to six times a year the Center holds events that require additional parking on a short-term basis. In advance of these special events, in order to avoid peak traffic conditions, the Center will be required to coordinate with GGNRA's Special Parks Uses Group.

*The Special Parks Uses Group could implement limitations on programs offered and scheduling of large events. An example is the requirement to hold Run for the Seals during the early-morning (non-peak) hours. During special events, the NPS could require that the Center provide traffic control officers at potential bottleneck locations to improve traffic flow and safety, in coordination with other relevant agencies as needed to ensure coordination with their operations and assure that proper permits are received and qualified personnel employed. The Center will be required to monitor attendance and parking impacts during special events and make this information available to the Special Parks Uses Group.*

**Annual Report Mitigation.** Under the Cooperative Agreement between the NPS and the Center, the Center will submit an Annual Report that will include things such as a description of services and programs, number of annual visitors, number of special event attendants, an annual maintenance plan, and sustainability program update. *The Center will be committed to keeping track of visitation and will develop a monitoring program with NPS staff.*

#### **Page A-2**

**Water Conservation.** Water saving devices, including low-flush toilets and low maintenance/drought tolerant landscaping shall be used. *The Center will coordinate with NPS to ensure that the water usage caps imposed by Marin Municipal Water District are maintained.*

#### **Page A-4**

**Protection for Wetlands.** *Construction of the ring road will result in the permanent fill of approximately 0.025 acres of non-jurisdictional wetland and indirect impacts to 0.055 acres of non-jurisdictional wetland. The U.S. Army Corps of Engineers verified the wetland delineation and determined that they will not take jurisdiction over the wetland. Even though the impact to wetlands is minimal and the compensation requirement is waived for this project, the Center will complete wetland enhancement in the project vicinity in order to support the NPS goal of increasing the quality and quantity of the nation's wetlands. The details of this enhancement will be determined at a later date but will replace the function, value, and overall area of the 0.08 acre wetland that will be directly and indirectly impacted by the project.*

#### **Public Outreach and Review of the EA**

- The environmental assessment was made available for public review and comment during a 30-day period beginning on April 20, 2004 and ending June 1, 2004. Public notice of the EA was provided to individuals, organizations, and agencies through the scoping process; notification on the GGNRA website; notices in the Marin Independent Journal on April 28 and 29, 2004 announcing the release of the EA; mailing of the EA to 79 recipients; noticing the project on the mailed agenda for the May GGNRA Public Meeting (over 1,300 recipients) and a postcard mailing to 130 other interested parties. The EA was sent to local libraries including Marin City Library, Marin Civic Center Library, Corte Madera Library, and Muir Woods National Monument Library. In addition, the EA was posted to the park's website and hard copies were sent to interested parties upon request.

- An Open House was held at the Marine Mammal Center on May 8, 2004. Tours were offered and several written comments were received. Approximately 35 persons stopped by during this open house.
- During the public comment period 15 letters were received. Of these, eleven primarily voiced support for the Center and the proposed improvements. Several of these letters expressed a preference for the Selected Alternative. Two commenters raised concerns regarding potential impacts from changes to traffic and projected increased visitation. Two others commented on specific issues of water use and flood control. A more detailed description of these letters and corresponding responses can be found in the Errata sheets attached to this document.
- The NPS conducted a public hearing on the EA on May 18, 2004. Four people spoke and provided public comments on the project. Their comments included support for the undertaking. One voiced concerns regarding the design of the proposed new construction. Details of these comments are also included in the Errata sheets attached to this document. Staff also presented the project and answered questions before the City of Sausalito on May 18, 2004.

In addition to the above efforts to solicit public input, the National Park Service and the Marine Mammal Center met with the representatives from the Marin Chapter of the Sierra Club. The intent of these meetings was to present the purpose and need for the upgrades and improvements, to describe how the EA addresses concerns regarding water and traffic and to answer any additional questions that either group might have. Comments from both these groups were incorporated into comment letters on the EA (described below).

## **Responses to Public Comments on the EA**

### **1. Sierra Club Marin Group, Gordon Bennett, Sierra Club Marin Group Conservation Chair (Subsequent letter sent June 1, 2004)**

The primary concerns addressed in the Sierra Club's two letters are increased visitation and potential traffic impacts. In particular Mr. Bennett calls into question the assertion made in the Environmental Assessment (EA) that an increase of up to ten visitors might be expected on peak days. Mr. Bennett had the opportunity to meet with staff of the Marine Mammal Center after his April 29<sup>th</sup> letter was submitted. As a result of this meeting the Sierra Club submitted a second letter that proposes several actions which, if taken, would mitigate their concerns. The major points from these letters are summarized below.

- *Parking* – The Sierra Club is specifically concerned that the preferred alternative proposes an increase in parking spaces at the treatment site. The Sierra Club letter makes specific suggestions for design and signage regarding designations of staff and visitor parking spaces within the proposed project area. The letter expresses the concern that if all staff spaces are not taken on a daily basis these empty spaces could attract additional visitors. The suggestion is made by the Sierra Club that parking for Center staff be designated and visitors be limited to specific spaces. They also suggest that visitor parking patterns be monitored and violations reported to NPS and dealt with through an adaptive management strategy. The implication from these comments is that available parking would increase visitation and thus increase traffic.
- *Increased Visitation/Traffic* - Given these concerns regarding parking and given that the EA describes a significant upgrade of visitor amenities, the Sierra Club does not believe that an increase of ten visitors per day is a reasonable estimate of increased visitation. The Sierra Club is concerned about what impact increased visitation might have on traffic in other locations within the Marin Headlands, especially given cumulative projects that are planned in the future for the Headlands/Fort Baker area.

The Sierra Club believes that an analysis of current and projected conditions at the Bunker/Alexander Roads intersection should be made and should include cumulative impacts from the expansion of the Discovery Museum and implementation of the Fort Baker plan. The Sierra Club believes this intersection, after taking into consideration the cumulative effects, is likely to operate at an unacceptable LOS during peak days.

- *Monitoring and Events* - The Sierra Club letter requests that several monitoring requirements relating to traffic and increased visitor use be included in the Center's Annual Report. The letter expresses concerns regarding the timing and monitoring of special events, particularly given that on some occasions groups not connected with GGNRA or the Center could hold events within the Headlands. The letter recommends that the Center measure peak day usage and additional monitoring occur for special events.

### **Response:**

*Parking* - The proposed plan is that parking would be consolidated at the treatment site. The Center would actually have fewer spaces available to staff and visitors than they currently are allocated. It is important to maintain flexibility in how these spaces are used (staff and visitors) as the number of staff needed significantly varies given the patient load at any given time. At times of peak patient load there are typically more staff and volunteers at the Center and more staff are typically needed during week days than on weekends. Staff also notes that there has always been an abundance of open parking available inside and outside the Center's designated area, and this has not increased visitation in the past.

Overall the number of parking spaces allocated for the Center's use would be reduced. However, the Center would be able to accommodate the projected demand for staff parking and the limited

visitor increase expected through both an improved, consolidated facility (one location) and by managing visitor hours to complement staff use peak hours.

*Increased Visitation/Traffic* - The EA's conclusion that increased visitation would not result in a significant impact in the future is based on the following:

- The Center is first and foremost a hospital. The welfare of patients is the first responsibility. As the commenter points out, the primary purpose of the Center is not to invite more people; it's to better treat the animals.
- The Center is not a display facility, such as a zoo or aquarium or museum. And the proposed facility improvements would not change this. Permitting/licensing granted by regulatory agencies prohibit the Center from being a display facility. The proposed changes at the treatment site would result in visitors having less access to animals in the new facility than exists today. The proposed design purposely places buildings between the public and the animals for the animals' protection. Viewing would be from an elevated deck which overlooks the hospital but does not provide close proximity to animals by the public. Therefore, it is not anticipated that there would be a significant increase in visitor trips.
- The Center is prohibited from charging admission and is not a marketed visitor destination. Therefore, there is no incentive to increase visitation except for the educational value of the Center's stewardship/conservation message.
- School groups and other educational programs are the only audiences targeted for visits. The Center is not specifically marketed as a visitor destination.

The Sierra Club voiced a specific concern that increased visitation to the Center would result in increased traffic impacts when assessed with the cumulative impacts of trips to the Bay Area Discovery Museum and Ft. Baker projects. In response to this concern, the Center and NPS contracted an additional study of the Level of Service (LOS) of the Bunker (Danes)/Alexander intersection, in combination with cumulative traffic growth resulting from the land uses identified in the Ft. Baker EIS. The results of this additional study show that there would not be a degradation of intersection operations below acceptable operating conditions.

The observation of potentially unacceptable operating conditions at the Danes Road / Alexander Avenue intersection referenced by the Sierra Club's comment letter is likely due to frequent congestion along the southbound U.S. 101 approach to the Golden Gate Bridge, as vehicles wait to access the southbound access ramp and queuing along Alexander Avenue occasionally extends to Danes Road. This queuing reduces the capacity of the study intersection. However, this is due to the downstream bottleneck and is not a result of inadequate capacity at the Danes Drive/Alexander Avenue intersection. The addition of project trips (excluding special events) to the Golden Gate Bridge approach on Alexander Drive would constitute just one trip during the Weekend Peak Hour, out of a total approach volume exceeding 600 trips. Therefore, the

addition of project trips to the southbound U.S. 101 approach would constitute less than 0.2 percent of the overall approach volume. However, under the “worst-case scenario” for a special event that distributed 100 trips through the Danes Road / Alexander Avenue intersection, sponsored by the Center or any other Park users, the distribution of trips to the southbound U.S. 101 approach would be 30 trips, therefore constituting up to five percent of the approach volume, which could constitute a significant impact.

Based upon this analysis, no significant impacts are expected at the Danes Drive / Alexander Avenue intersection as a result of typical daily traffic generated by the project or from the occasional special event. Additionally, project trips (excluding special events) are not expected to generate a significant impact to the southbound approach to the U.S. 101 ramps from Alexander Avenue.

*Monitoring and Events* - Mitigation included in the EA requires that the Center prepare an Annual Report that will include things such as a description of services and programs, number of annual visitors, number of special event attendants, an annual maintenance plan, and sustainability program update. This report will be used by the NPS to monitor the changes in visitor use, parking patterns, and the effects of special events. As a result, this will allow NPS to then require the Center to employ adaptive management techniques to address any problems that arise. This could include the adoption of further TDM strategies, in coordination with the park’s TDM measures for the Headlands area. The Center will be committed to keeping track of visitation and will develop a monitoring program with NPS staff.

## **2. Marin Municipal Water District, Eric McGuire, Environmental Services Coordinator**

This letter states that the Water District provides potable water to the project area and that the NPS has an annual water use entitlement for all of GGNRA. The letter points out that the NPS’ yearly entitlement is 215.54 acre-feet annually and actual annual water use through the NPS meter has varied from 85.95 acre-feet to 191.99 acre feet. The District emphasizes the need for GGNRA to stay within its yearly use entitlement. The District also states that it does not have access to information to accurately measure the water used only by the Center. They claim that the information in the EA is difficult to compare for existing and future use of domestic water. The District also assumes that the use of high-pressure filtered seawater for wash-downs has been considered and rejected as part of this process.

### **Response:**

The NPS is currently within its annual use entitlement and future projections that take into account improvements at Fort Baker show that NPS will still be within these entitlements and the projected water use at the Center would decrease under the proposed project. Therefore, the

Center's draw on the park's annual entitlement would decrease with the employment of conservation measures, water saving devices, and modern, efficient equipment.

### **3. Letters of Support**

Eleven separate letters were received during the public comment period that primarily voiced support for the Center and the proposed improvements. Letters were received from volunteers, private citizens and several veterinarians from the University of California at Davis. Several of these letters expressed a preference for the Selected Alternative. Several comments involving minor site design recommendations and amenities were received, but determined to be outside of the scope of the EA.

#### ***Response:***

The National Park Service acknowledges the comments. No further response is necessary. The suggestions outside of the scope of the EA will be considered in future planning efforts that do not involve NEPA compliance.

### **4. Federal Emergency Management Agency, Michael Shore, Community Mitigation Programs**

This letter from FEMA gives the requirements for buildings that are planned for development within a floodplain as defined by the National Flood Insurance Program (NFIP).

#### ***Response:***

The National Park Service acknowledges the comment. Since the project site is not within a floodplain, the stated requirements would not be applicable.

### **5. City of Sausalito, Drummond Buckley, AICP, Planning**

The City of Sausalito's primary concerns are about potential traffic impacts. In particular The City calls into question the assertion made in the Environmental Assessment (EA) that an increase of up to ten visitors might be expected on peak days. This letter also requests that the environmental analysis look at potential impacts from the change of use in the buildings at Fort Cronkhite.

#### ***Response:***

The response to Letter # 1 from the Sierra Club provides further explanation as to why increased visitation would not result in any significant impacts in the future. This response also references changes made to the Annual Report and Transportation mitigations, as discussed in this Errata, to require future monitoring and address potential impacts if they occur. The additional study referenced in the response to the Sierra Club letter also show that even with the changed use at

Fort Cronkhite, there would not be a degradation of intersection operations below acceptable operating conditions.

### **Oral Comments**

During the May 18, 2004 Golden Gate National Recreation Area Advisory Commission public meeting, four people provided oral comments. All four expressed general support for the Center and its mission. One commenter expressed concerns regarding the aesthetics of the proposed site plan and new buildings.

One commenter expressed the concern that the proposed project does not indicate bus parking.

### **Response:**

In the Environmental Consequences section of the EA, under Cultural Resources (p.IV-24), the following statement is made: “New construction would be compatibly designed and sited in keeping with the character-defining elements of the Forts Barry, Baker, and Cronkhite Historic District. Compatibility Guidelines...would encourage the design of new buildings to be compatible in scale, massing, color, material and character with the historic district.”

Furthermore, mitigation provided on page A-6 of the EA states that “Historic Compatibility Guidelines for New Facilities at the Marine Mammal Center will be prepared as part of this project and will be subject to review and approval by NPS. All new designs shall be reviewed for compatibility with the cultural landscape of the Historic District per the Standards for the Treatment of Historic Properties. Design of all new construction, including site work, shall be compatible in terms of architectural elements, scale, massing, materials, and orientation.”

The EA will be clarified to explain that bus parking will be located in the NPS maintenance yard near the Center.